

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

<b>UNITED STATES OF AMERICA</b>	)	<b>Case No. 23-mj- 1276</b>
	)	
<b>v.</b>	)	<b>Nos. TM45-6323035</b>
	)	<b>MAGISTRATE JUDGE HOLMES</b>
<b>MARCEL K. WILSON</b>	)	

**MOTION TO DISMISS CITATION**

COMES NOW the United States, by and through United States Attorney Henry C. Leventis and Assistant United States Attorney Nicholas J. Goldin, and respectfully requests that the Court dismiss the above-captioned case. In August 2022, a Special Agent with the United States Postal Service’s Office of Inspector General (“USPS-OIG”) began investigating whether Defendant Marcel Wilson, who was a U.S. Postal Service employee at the time, had obstructed the mail by throwing away mail he was obligated to deliver during the summer of 2022. The defendant later admitted to USPS-OIG that he had thrown away deliverable mail no less than 10 times between May and August 2022.

On the basis of this admission and other facts obtained during the investigation, USPS-OIG cited the defendant for obstruction of mail, in violation of 18 U.S.C. § 1701. The defendant’s citation was placed on the December 2022 petty offense docket, and the matter was continued several times on the defendant’s motion. The parties have now agreed to resolve the case. Specifically, the United States has agreed to move to dismiss the pending citation with prejudice in exchange for the defendant’s agreement to never again seek employment at the U.S. Postal Service. Attached as **Exhibit A** to this Motion is the defendant’s signed declaration confirming that, in consideration for dismissal of this citation, he will not seek future employment at the U.S.

Postal Service. Accordingly, the United States respectfully requests that the Court grant its motion to dismiss by entering the attached proposed order.

Respectfully submitted,

HENRY C. LEVENTIS  
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Middle District of Tennessee

s/ *Nicholas J. Goldin*  
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**CERTIFICATE OF SERVICE**

I hereby certify that on October 4, 2023, a true and correct copy of the foregoing has been served on counsel for the defendant, Peter Strianse, via email.

s/ *Nicholas J. Goldin*  
NICHOLAS J. GOLDIN  
Assistant United States Attorney